Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Peace Valley Products, Inc.
P.O. Box 91
Bartow, Florida 33831

Authorized Representative:
Christopher B. Cook, Vice President

Air Permit No. 1050454-002-AO
Air Operation Permit

Peace Valley Products
Polk County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of Peace Valley Products which is a fertilizer recycling facility (Standard Industrial Classification No. 2875). This project is the initial operation permit for an off-spec fertilizer recycling facility. The facility is located in Polk County at 800 Pembroke Road in Fort Meade, Florida. The UTM coordinates are Zone 17, 420.06 kilometers (km) East, and 3074.1 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-470-5700.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e)

A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

1050454-002-AO Effective Date: May 13, 2016
Renewal Application Due Date: March 14, 2021
Expiration Date: May 13, 2021

Executed in Hillsborough County, Florida.

for

Pamala Vazquez
Program Administrator
Permitting & Waste Cleanup Program
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Christopher B. Cook, Vice President, Peace Valley Products, ccook@peacevalleyproducts.com
William H. Cook P.E., Peace Valley Products, Inc., bcook@peacevalleyproducts.com
Scott Borderieux, Florida DEP Southwest District, Scott.Borderieux@dep.state.fl.us
Danielle Henry, Florida DEP Southwest District, Danielle.D.Henry@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes May 13, 2016
(Clerk) (Date)

FACILITY DESCRIPTION

This facility is an off-spec fertilizer recycling facility. The process includes drying, screening, grinding and conveying of the raw materials to produce final products which includes semi-granular and granular phosphate products. The semi-granular product is sold to the NPK industry as feed stock and the granular product is sold as granular fertilizer in the retail market. This facility is a natural minor source of particulate matter (PM).

The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
001	Off-Spec Fertilizer Recycling Operation

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU Nos.
State Rule Citations	
Rule 62-4 F.A.C., General Permitting Requirements	Facility Wide
Rule 62-210.650, F.A.C. Circumvention	001
Rule 62-296.320(1)., F.A.C. Volatile Organic Compounds	Facility Wide
Rule 62-296.320(4)(b)1., F.A.C. VE Emission Standard	001
Rule 62-296.320(4)(c)., F.A.C. Unconfined Emissions	Facility Wide

EXEMPT EMISSION SOURCES/ACTIVITIES

– Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions from the 595 gallon storage tank used to store and apply de-dusting agent to the final fertilizer product are exempt pursuant to Rule 62-210.300(3)(b)1., F.A.C. The operation will potentially consume up to 112,000 pounds per year of undiluted de-dusting agent. (Generic Emissions Unit or Activity Exemption).

Note: The undiluted de-dusting agent has a concentration of more than 80% glycerol and less than 1 % Methanol. The de-dusting agent contained in the storage tank will be diluted with water to a range between 20% and 40% of the undiluted concentration. Because, glycerol has a very low vapor pressure (< 1 mm Hg) and the methanol content is low, the VOC and HAPs emissions from the system are negligible.

– Particulate matter (PM) emissions from the power screening of gypsum, dolomite and recycled sulfur are exempt pursuant to Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption).

Note: The screened materials will have moisture content ranging from 4 to 8 percent.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is a natural minor source of air pollution.

PERMIT HISTORY/AFFECTED PERMITS

This permit is the initial air operation permit for this facility.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air and Solid Waste Permitting Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-470-5700
   E-mail: SWD_Air_Permitting@dep.state.fl.us

   All documents related to applications for permits to operate an emissions unit shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

   Florida Department of Environmental Protection
   Southwest District Office
   Compliance Assurance Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-470-5700
   E-mail: SWD_Air@dep.state.fl.us

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. To properly apply for an operation permit, the applicant shall submit the following:
   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;
   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
   c. copies of the most recent month of records/logs specified in Specific Condition No(s). A.5. and

   [Rules 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU Group Description

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Off-Spec Fertilizer Recycling Operation – This emissions unit receives two sources of raw materials which are delivered by trucks to the facility. The first raw material comes from rail cars that are cleaned prior to being loaded with phosphate fertilizer and the second material is off-specification product received from phosphate producers. The material recovered from rail car cleaning contains grain and is normally damp or wet. The off-specification product from phosphate producers is also physically damp or wet. The fertilizer recycling operation consists of three separate systems which includes the Drying System, the Grinding Circuit and the Shipping System. The systems are described below. 1. Dryer System – This system dries raw feed materials and screens it into three grades; semi-granular, granular and oversized. Damp raw material with a moisture content between three and five percent is fed to the dryer feed conveyor (via a front end loader and Feed Hopper #1) which discharges into a ribbon blender which feeds the dryer. The dryer is a 54 inch diameter by 33 feet long standard rotary dryer that operates with co-current airflow. The dryer is fired with propane and has a design heat input rate of 3 million Btu per hour. a. The air stream from the dryer is vented through a cyclone and then through a venturi scrubber system which discharges to the atmosphere. b. Dry material from the dryer is discharged onto a conveyor and then to the Rotex Screen. The Rotex Screen is an enclosed system that separates the material into three streams and transfers them either by screw conveyor or directly discharged into an enclosed cubical bins with an open side for material removal. c. Fugitive emissions from screen and transfer points from the dryer discharge are vented, cleaned with a cyclone and then transferred into the dryer combustion chamber for quench air. Quench air is required to control inlet gas temperature as well as supplying the volume of air to remove moisture from the dried product. 2. Grinding Circuit With Baghouse – This system grinds oversized materials (i.e., material containing grain that must be ground and used as semi-granular product). The system consists of a cage mill and a single deck enclosed Rotex Screen. Over size material is fed to the Cage Mill (via a front end loader and Feed Hopper #2) via front end loader. Fugitive emissions from the Cage Mill, Rotex Screen and transfer points are vented through a baghouse (i.e., Baghouse #1). The cage mill minimizes the loss of fugitive dust by sealing the inlet and outlet with rotary air lock valve. 3. Shipping System With Baghouse – This system is used to loads final products into trucks for shipping. The system consists of a hopper (Feed Hopper #3) and feed conveyor, an enclosed ribbon mixer (used for applying a de-dusting agent) and a discharge conveyor to discharging final products into trucks. Fugitive emissions from the feed hopper and feed conveyor are vented through a baghouse (i.e., Baghouse #2). The de-dusting agent used contains some VOC (glycerol); however, it has very low vapor pressure (< 1 mm Hg) and will be diluted with water. *Notes: The permit application dated June 8, 2015 includes a process flow diagram of the operation described above.*

A. EU Group Description

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: This emission units is limited to a maximum allowable throughput rate of 50,000 tons per any consecutive 12-month period.
[Rule 62-210.200, definition of Potential to Emit (PTE), F.A.C.; Construction Permit 1050454-001-AC]

A.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.3. Emissions Standards:

a. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement.

[Construction Permit No. 1050454-001-AC and Rule 62-296.320(4)(b)1, F.A.C.]

b. Unconfined Particulate Emissions - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include the following:

a. Paving and maintenance of roads, parking areas and yard.

b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, pipe flattening and land clearing.

c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yard, open stock piles an similar activities.

d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.

e. Landscaping or planting vegetation.

f. Use of hoods fans, filters and similar equipment to contain, capture and/or vent particulate matter. *Note: This precaution includes the use of the Grinding Circuit Baghouse (Baghouse No 1) and the Shipping System Baghouse (Baghouse No.2).*

[Construction Permit No. 1050454-001-AC and Rule 62-296.320(4)(c), F.A.C.]

c. Reasonable Precautions to Prevent VOC and Organic Solvent Emissions - The permittee shall not store, pump, handle process, load, unload, or use in any process or installation, VOC or OS's without applying know and existing vapor emission control devices or systems deemed necessary by the Department. Reasonable precautions and/or controls shall include the following:

a. Tightly covering or closing all de-dusting agent containers when not in use.

b. Immediately confine and clean up any spill; make sure waste are placed in closed containers for reuse, recycle or proper disposal.

[Rule 62-296.320(1), F.A.C.]

A. EU Group Description

EMISSIONS AND CONTROLS

A.4. Circumvention - The permittee shall not circumvent the air pollution control equipment (i.e. the dryer system venturi scrubber) or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.]

RECORDS AND REPORTS

A.5. Monthly Log for Throughput: To demonstrate compliance with the throughput limits of Specific Condition No. A.1., the permittee shall keep the following records:

a. Facility Name, Facility Number (1050454), Emission Unit No. (001), Month, Year;
b. The total quantity of off-spec fertilizer fed to the dryer (in tons) for the month;
c. The total quantity of off-spec fertilizer fed to the dryer (in tons) for the most recent consecutive 12-month period.

Monthly records shall be completed by the end of following month and shall be maintained as required by the records retention requirements of Appendix C.
[Rule 62-4.070(3), F.A.C]